

RECEIVED In The United States District Court
Eastern District of Missouri
DEC 28 2016 Eastern Division

BY MAIL

United States of America,)
Plaintiff,)
vs.) NO. 15 CR 00404-HEA (NAB)
Michael Grady,)
Defendant.)

Defendant's Motion for Reconsideration of
Order Entered on December 23, 2016

Comes Now, the defendant, Michael Grady, pro se,
and respectfully moves this court for reconsideration
of Order entered on December 23, 2016, and
state the following:

That pursuant to 18 USC § 3142 (i), the
judicial officer may, by subsequent order,
permit the temporary release of the defendant
in custody... to the extent that the judicial
officer determines such release to be necessary
for preparation of the defendant's defense or
for another compelling reason.

Factors to be considered pursuant to 18 USC §
3142 (g) is (1) the nature and circumstances
of the offense..., (2) the weight of the
evidence against the person, and (3) the history
and characteristics of the person...

The Magistrate Court in the instant case
has not had the ability to review the
Government's discovery material against
the defendant, instead, the Government
suggests that the severity of the charge
and 30 year old conduct is sufficient to
detain defendant. Note Specifically the

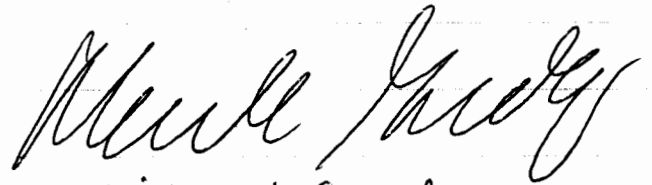
Government does not provide a single shred of evidence or any material witnesses that can remotely connect him to the charged offenses. In fact, the Government is in possession of exculpatory evidence and material witnesses that will exonerate or cast serious doubt as to his guilt in the charging document.

This Court should hold the Government to a higher standard to keep a man indefinitely detained on a mere hunch, speculation, or dislike for personal reasons. The Government does not have an inkling of evidence to support their theory against the defendant, which also warrants suspicion in the institution of the prosecution and what information was conveyed to the Grand Jury.

WHEREFORE, the defendant, Michael Grady, pro se, pray that this court, in an abundance of caution, reconsider its order entered on December 23, 2016, and issue an order directing the Government to provide this court with authentic evidence and witness testimony connecting him to the alleged offenses, so prayed.

Please view in light of *Haines vs. Kerner* (1972), 404 U.S. 519, 520-521.

Respectfully Submitted,



Michael Grady
Ste. Genevieve Detention Center
5 Baskin Drive
Ste. Genevieve, MO 63670

Certificate of Service

A true copy of the foregoing was mailed
on this 25th day of December, 2016 to
the following:

United States Attorneys Office
Paul Hale, Attorney for Defendant

